

Exhibit E

MAC Combined Invoice

**MARQUIS AURBACH
COFFING**

ATTORNEYS AT LAW

10001 PARK RUN DRIVE
LAS VEGAS, NEVADA 89145
Telephone 702-382-0711
Fax 702-382-5816Account Corp of Southern Nevada
Attn: Paul Liggio and/or Amanda Patterson
4955 S. Durango Drive, Suite 177
Las Vegas, NV 89113Invoice 359527 - 375400
March 10, 2021

ID: 14665-019 - CFC

Re: Ahmed, Shafique & Munoz, Mayra adv.

For Services Rendered Through March 10, 2021

Current Fees	74,614.00
Current Disbursements	3,299.72
Current Interest	40.73
Total Current Charges	77,954.45

Total Current Due	77,954.45
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Total Due	77,954.45
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Total	0.00	0.00	0.00	0.00	0.00
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MARQUIS AURBACH COFFING P.C.

Account Corp of Southern Nevada
 Re: Ahmed, Shafique & Munoz, Mayra adv.
 I.D. 14665-019 - CFC

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Fees				
Date	Atty	Description	Hours	Amount
11/04/19	JMM	Receipt and review notice of new case filing; review court docket to assess and evaluate status of proceedings and to obtain a copy of the operative pleading and exhibits thereto; email clients regarding same.	0.40	98.00
11/04/19	CFC	Email exchanges with client regarding [REDACTED] review and assess complaint.	0.70	213.50
11/15/19	CFC	Coordinate with staff regarding obtaining pleadings from justice court cases.	0.20	61.00
11/18/19	JMM	Further assessment of complaint in preparation to draft motion to dismiss same.	0.30	73.50
11/22/19	JMM	Begin legal research for, outline, and begin drafting motion to dismiss complaint.	1.60	392.00
11/23/19	JMM	Review and revision of prior motion content; continue legal research and drafting and revision of motion to dismiss; send email to client [REDACTED]	3.90	955.50
11/23/19	CFC	Review, assess, and evaluate issues and arguments relative to motion to dismiss; coordinate with JMM on same; review and assess email to client [REDACTED]	0.90	274.50
11/25/19	JMM	Telephone call with client [REDACTED]	0.10	24.50
11/25/19	JMM	Telephone call with client regarding [REDACTED] receipt and review subsequent email from WeTransfer and download documents from client; assess, analyze and review same to identify operative contracts to be included with motion to dismiss; format and organize exhibits, and review and revision of motion to finalize, and file same; prepare and file certificate of interested parties and disclosure statement, and file same.	1.30	318.50
11/25/19	CFC	Review, edit, and revise motion to dismiss; coordinate with JMM on same.	0.90	274.50
12/08/19	JMM	Outline, begin legal research for, and begin drafting motion to stay discovery pending resolution of motion to dismiss.	3.20	784.00
12/08/19	CFC	Review and assess opposition to motion to dismiss.	0.80	244.00
12/09/19	JMM	Receipt and review notice of electronic filing and related clerk's notice regarding opposing counsel's violation of rule relating to account information.	0.10	24.50
12/09/19	JMM	Receipt and review notice of electronic filing, and assess, analyze and review plaintiffs' corresponding response to client's motion to dismiss; begin legal research to evaluate validity of arguments in same.	1.00	245.00
12/10/19	JMM	Outline, begin legal research, and begin drafting reply in support of motion to dismiss.	3.30	808.50
12/10/19	JMM	Continue legal research and drafting of reply in support of motion to dismiss.	3.00	735.00

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Date	Atty	Description	Hours	Amount
12/10/19	CFC	Review, assess, and evaluate issues and arguments relative to reply in support of motion to dismiss; legal research regarding case law relative to same; review and assess same; coordinate with JMM on same.	2.60	793.00
12/11/19	JMM	Assess, analyze, and review new U.S. Supreme Court decision regarding FDCPA claim accrual, and strategize regarding use of same to dispose of case.	0.20	49.00
12/11/19	JMM	Continue legal research and complete initial drafting of reply in support of motion to dismiss in anticipation of Mr. Clement's review.	3.80	931.00
12/12/19	JMM	Conduct further legal research in conjunction with review and revision of motion to stay discovery pending decision on motion to dismiss to supplement, proofread, and finalize draft of same for Mr. Clement's review.	2.30	563.50
12/16/19	JMM	Conduct further legal research regarding ability to charge collection agency fee as a cost of collection.	0.60	147.00
12/16/19	JMM	Review and revision of motion to stay discovery pending decision on motion to dismiss.	0.30	73.50
12/16/19	CFC	Draft additions and revisions to motion to dismiss; review, edit, and revise same.	1.60	488.00
12/16/19	CFC	Legal research regarding Ninth Circuit case law on FDCPA issues relative to collection fees, costs, attorney fees, and contractual language on same; legal research regarding Ninth Circuit case law on other Circuits' case law relative to same.	1.10	335.50
12/18/19	JMM	Receipt and review email exchange regarding scheduling and deadline for Rule 26 discovery conference.	0.10	24.50
01/03/20	JMM	Review court docket to assess and evaluate status of proceedings and identify outstanding issues to be addressed; develop plan of action relative to same.	0.20	55.00
01/08/20	JMM	Receipt and review multiple emails from opposing counsel regarding motion to stay and joint discovery plan and scheduling order; coordinate with Mr. Clement regarding handling of same.	0.20	55.00
01/08/20	CFC	Review, edit, and revise motion to stay discovery pending decision on motion to dismiss.	1.20	390.00
01/08/20	CFC	Review and assess email from opposing counsel regarding scheduling FRCP 26(f) conference and proposed discovery plan and scheduling order; review and assess same.	0.30	97.50
01/09/20	JMM	Assess, analyze, and review email from opposing counsel regarding phasing of discovery and class certification; strategize action to be taken in light of same.	0.20	55.00
01/09/20	CFC	Email exchanges with opposing counsel regarding scheduling FRCP 26(f) conference.	0.40	130.00
01/09/20	CFC	Telephone call with opposing counsel to conduct FRCP 26(f) conference.	0.60	195.00
01/09/20	CFC	Email exchanges with opposing counsel following FRCP 26(f) conference regarding discovery scheduling, bifurcating discovery, and	0.60	195.00

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Date	Atty	Description	Hours	Amount
01/09/20	CFC	discovery plan and scheduling order; review and assess draft of same.	1.40	455.00
01/10/20	JMM	Review, assess, and evaluate issues, positions, and strategy relative to discovery scheduling, bifurcating discovery, and class certification; research regarding same.	0.80	220.00
01/10/20	JMM	Assess, analyze and review email from K. Gesund regarding insistence on providing discovery plan immediately, refusal to phase discovery, and information sought by same; conduct legal research relative to Ms. Gesund's right and/or ability to obtain same.	0.20	55.00
01/10/20	JMM	Assess, analyze, and review email exchange between counsel regarding discovery plan and scheduling order, timing, and related events relating to same.	1.90	617.50
01/10/20	CFC	Email exchanges with opposing counsel regarding issues relative to bifurcating discovery, discovery plan and scheduling order, and additions to same; telephone calls with same regarding same; research regarding same.	1.40	455.00
01/10/20	CFC	Telephone calls with client regarding [REDACTED] [REDACTED] [REDACTED]	0.80	260.00
01/10/20	CFC	Review and assess filed individual discovery plan and scheduling order; evaluate same and response to same; coordinate with JMM on same and issues relative to same.	0.20	55.00
01/13/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review plaintiffs' corresponding individual discovery plan and scheduling order; evaluate action to be taken in response to same.	0.80	260.00
01/13/20	CFC	Draft notice of intent to submit individual discovery plan and scheduling order; review, edit, and finalize same.	0.20	55.00
01/16/20	JMM	Receipt and review notice of electronic filing and court's corresponding order rejecting plaintiff's individual discovery plan and scheduling order.	0.20	55.00
01/16/20	JMM	Assess, analyze, and review email from D. Armenta regarding [REDACTED] [REDACTED] [REDACTED]	0.60	195.00
01/16/20	CFC	Review and assess email from Donna Armenta regarding [REDACTED] [REDACTED] review and assess same.	0.20	65.00
01/16/20	CFC	Review and assess order denying individual discovery plan and scheduling order; review and assess email from opposing counsel regarding same.	0.20	65.00
01/21/20	CFC	Email exchange with opposing counsel regarding status of additions to discovery plan and scheduling order.	2.40	780.00
01/21/20	CFC	Draft discovery plan and scheduling order; review and assess prior versions of same; legal research regarding class action discovery, bifurcating discovery, class certification issues, and timing of same; email to opposing counsel forwarding draft discovery plan and scheduling order.	0.20	55.00
01/22/20	JMM	Assess, analyze, and review multiple notices of electronic filing and		

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Date	Atty	Description	Hours	Amount
		corresponding discovery plan-related documents filed; assess, analyze, and review numerous emails exchanged between counsel regarding proposed revisions to same.		
01/22/20	JMM	Receipt and review notice of electronic filing and corresponding clerk's notice regarding problems with plaintiffs' counsel's filings.	0.10	27.50
01/22/20	CFC	Review and assess opposition to motion to dismiss; legal research regarding case law and statutes cited in same; review and assess same.	0.60	195.00
01/22/20	CFC	Review and assess email from opposing counsel regarding additions and revisions to discovery plan and scheduling order; review and assess same; email exchanges with same regarding issues relative to same.	0.90	292.50
01/23/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review defendants' corresponding opposition to motion to stay discovery.	0.40	110.00
01/23/20	CFC	Draft additions and revisions to discovery plan and scheduling order; review and assess issues and strategy relative to same; email to opposing counsel regarding same and approval of same for filing.	1.30	422.50
01/23/20	CFC	Legal research regarding issues relative to class action certification, bifurcating discovery, and timing of class certification motion.	1.40	455.00
01/23/20	CFC	Review and assess email from client [REDACTED] [REDACTED] review and assess same; evaluate next steps in federal case, in light of same.	0.40	130.00
01/23/20	JMM	Assess, analyze, and review briefing on motion to dismiss for lack of jurisdiction and countermotion to transfer to district court in order to strategize regarding litigation involving K. Gesund.	0.40	110.00
01/25/20	CFC	Email exchange with client regarding [REDACTED] [REDACTED] [REDACTED] review and assess same and briefing on same.	0.50	162.50
01/26/20	JMM	Assess, analyze, and review email exchange with client regarding [REDACTED] [REDACTED]	0.10	27.50
01/28/20	JMM	Further review of plaintiffs' opposition to motion to stay; outline, begin legal research, and begin drafting reply in support of motion.	2.60	715.00
01/29/20	CFC	Begin drafting reply in support of motion to stay discovery; begin reviewing and assessing prior briefing on same and motion to dismiss, in connection with same; begin legal research regarding case law on issues relative to same and FDCPA claim in case.	2.90	942.50
01/29/20	CFC	Continue drafting reply in support of motion to stay discovery; continue reviewing and assessing prior briefing on same and motion to dismiss, in connection with same; continue legal research regarding case law on issues relative to same and FDCPA claim in case.	3.10	1,007.50
01/29/20	CFC	Continue drafting reply in support of motion to stay discovery; continue reviewing and assessing prior briefing on same and motion to dismiss, in connection with same; continue legal research regarding case law on issues relative to same and FDCPA claim in case; review, edit, and revise reply in support of motion to stay discovery; finalize same for	3.30	1,072.50

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Date	Atty	Description	Hours	Amount
		filing.		
01/30/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and briefly review client's corresponding reply in support of motion to stay discovery.	0.20	55.00
01/31/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review corresponding order granting motion to stay discovery pending decision on motion to dismiss; assess, analyze, and review subsequent email exchange regarding same and regarding strategy in justice court in light of same.	0.30	82.50
01/31/20	CFC	Review and assess order granting motion to stay discovery.	0.40	130.00
01/31/20	CFC	Email exchanges with client and Donna Armenta regarding [REDACTED] [REDACTED] [REDACTED]	0.50	162.50
02/04/20	JMM	Receipt and review email from Ms. Armenta with attached motion for summary judgment in Ahmed justice court case.	0.20	55.00
02/04/20	CFC	Email exchanges with client regarding [REDACTED] [REDACTED] review and assess same.	0.20	65.00
02/05/20	JMM	Receipt and review notice of electronic filing, and assess, analyze and review plaintiffs' corresponding verified petition for pro hac vice admission of out-of-state counsel and court's corresponding minute order instructing petitioner to submit certificates of good standing for each licensing jurisdiction.	0.30	82.50
02/05/20	CFC	Review and assess motion for permission to appear pro hac vice.	0.10	32.50
02/05/20	CFC	Review and assess order denying without prejudice motion to appear pro hac vice.	0.10	32.50
02/11/20	JMM	Receipt and review multiple emails regarding K. Gesund settlement offer; receive telephone call from Ms. Patterson [REDACTED] strategize action to be taken in light of same.	0.40	110.00
02/11/20	CFC	Review and assess email from client regarding [REDACTED] [REDACTED] email exchanges with client regarding [REDACTED] legal research regarding same and TILA issues; coordinate with JMM on same.	1.40	455.00
02/12/20	CFC	Telephone call with client regarding [REDACTED] [REDACTED] [REDACTED]	1.10	357.50
02/19/20	JMM	Receipt and review email from Ms. Armenta [REDACTED] [REDACTED]	0.40	110.00
02/19/20	CFC	Review and assess opposition to motion for summary judgment and counter motion for stay in state court case.	0.20	65.00
02/20/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review court's corresponding order denying verified petition for attorney Bragg to appear pro hac vice, instructing the same to file a new, compliant petition or face striking anything filed by Mr. Bragg; review docket to identify which documents were filed by same to assess and	0.30	82.50

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Date	Atty	Description	Hours	Amount
		evaluate potential effect of order.		
02/20/20	CFC	Review and assess order denying motion for pro hac vice admission.	0.10	32.50
02/28/20	CFC	Review and assess motion for pro hac vice admission.	0.10	32.50
02/29/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review plaintiffs' corresponding verified petition for pro hac vice admission of out-of-state counsel to practice.	0.20	55.00
03/02/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review court's corresponding order granting Mr. Bragg's petition to appear and practice pro hac vice with designation of K. Gesund as local counsel.	0.20	55.00
03/02/20	CFC	Review and assess order on motion for pro hac vice petition.	0.10	32.50
03/03/20	JMM	Receipt and review email with attachments from client regarding [REDACTED]	0.20	55.00
03/03/20	CFC	Review and assess email from Donna Armenta regarding [REDACTED]	0.20	65.00
03/06/20	CFC	Review and assess email exchanges with Donna Armenta regarding [REDACTED]	0.20	65.00
03/16/20	CFC	Review and assess information relative to plaintiff filing lawsuit against RC Willey relative to collection fee and TILA; coordinate with JMM on same.	0.20	65.00
03/23/20	CFC	Review and assess email from client regarding [REDACTED]	0.40	130.00
05/05/20	JMM	Receipt and review email from D. Armenta and multiple attachments to same regarding [REDACTED]	0.30	82.50
05/06/20	JMM	Receipt and review emails from Ms. Armenta regarding [REDACTED] [REDACTED] [REDACTED] telephone conference with same regarding same.	0.90	247.50
05/06/20	JMM	Conduct research regarding [REDACTED] [REDACTED]; exchange emails with Ms. Armenta [REDACTED]	0.40	110.00
05/06/20	CFC	Telephone call with Donna Armenta regarding [REDACTED] [REDACTED]; email exchanges with same [REDACTED] [REDACTED] review and assess same.	1.50	487.50
05/07/20	JMM	Exchange emails with Ms. Armenta regarding [REDACTED] [REDACTED]	0.20	55.00
05/07/20	CFC	Email exchanges with Donna Armenta regarding [REDACTED] [REDACTED]	0.40	130.00
06/11/20	JMM	Receipt, review, and respond to email from Ms. Armenta regarding [REDACTED]	0.10	27.50

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Date	Atty	Description	Hours	Amount
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
06/17/20	CFC	Review and assess order granting motion to dismiss; coordinate with JMM on issues relative to same.	0.90	292.50
06/17/20	CFC	Review and assess judgment.	0.10	32.50
06/17/20	CFC	Email exchanges with client regarding [REDACTED]	0.30	97.50
06/18/20	JMM	Begin legal research and begin drafting motion for attorney fees.	2.30	632.50
06/18/20	CFC	Review and assess email exchanges with client regarding [REDACTED]	0.10	32.50
06/22/20	JMM	Continue legal research and drafting motion for attorney fees; begin to gather and organize exhibits to same.	3.50	962.50
06/22/20	JMM	Review file to evaluate necessary facts to be included, and draft declaration of Ms. Armenta in support of motion for attorney fees; email same to same for review and signature.	0.40	110.00
06/22/20	JMM	Review billing invoices to mark and apply redactions for submission as exhibit to motion for attorney fees.	1.20	330.00
06/22/20	JMM	Draft declaration of Chad Clement in support of motion for attorney fees.	0.80	220.00
06/22/20	CFC	Legal research regarding issues and standards relative to attorney fees under FDCPA for claim made in bad faith and for purposes of harassment; review and assess case law on same; review, assess, and evaluate issues, arguments, and positions relative to motion for attorney fees; coordinate with JMM on same.	1.30	422.50
06/23/20	JMM	Legal research regarding plaintiffs' deadline to move for reconsideration to strategize regarding timing of filing motion for attorney fees.	0.30	82.50
06/23/20	CFC	Review, edit, and revise motion for attorney fees.	0.50	162.50
06/24/20	CFC	Email exchanges with Donna Armenta regarding [REDACTED]	0.20	65.00
06/26/20	JMM	Analysis and strategy regarding [REDACTED] telephone call with client [REDACTED].	0.80	220.00
06/26/20	CFC	Telephone call with opposing counsel regarding settlement proposal; coordinate with JMM regarding same and issues relative to same.	0.50	162.50
06/28/20	CFC	Review and assess email from opposing counsel regarding settlement proposal.	0.10	32.50
06/29/20	CFC	Review, assess, and evaluate issues relative to settlement, bill of costs, motion for reconsideration, and next steps; coordinate with JMM on same.	0.40	130.00
06/29/20	CFC	Email exchange with Donna Armenta regarding [REDACTED]	0.20	65.00

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Date	Atty	Description	Hours	Amount
06/29/20	CFC	Review and assess email from opposing counsel regarding potential extension on opposition to motion for fees and settlement.	0.10	32.50
06/30/20	CFC	Review, assess, and evaluate issues relative to bill of costs; coordinate with JMM on same.	0.20	65.00
06/30/20	CFC	Telephone call with client regarding [REDACTED]	0.30	97.50
07/01/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review plaintiffs' corresponding motion to amend complaint and exhibits thereto; email to client for review.	0.50	137.50
07/01/20	CFC	Review and assess motion for leave to file first amended complaint; review and assess proposed first amended complaint; review and assess email to client [REDACTED]	0.70	227.50
07/07/20	JMM	Receipt and review email from Ms. Armenta regarding [REDACTED]; assess, analyze and review motion; review file to gather related moving papers from similar case, and respond to Ms. Armenta [REDACTED].	0.40	110.00
07/07/20	JMM	Legal research regarding plaintiffs' ability to amend complaint after dismissal and entry of judgment.	1.60	440.00
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
07/08/20	JMM	Draft opposition to motion for leave to amend complaint.	1.10	302.50
07/08/20	JMM	Conduct legal research regarding whether dismissal without prejudice constitutes an appealable order.	0.80	220.00
07/08/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review plaintiffs' corresponding opposition to motion for attorney fees.	0.60	165.00
07/08/20	CFC	Review and assess opposition to motion for attorney fees.	0.40	130.00
		[REDACTED]		
		[REDACTED]		
07/13/20	JMM	Analysis and strategy regarding timing of filing opposition to motion to amend relative to deadline for plaintiffs to file motion for rule 59 or 60 relief; review applicable authority relevant to same and conduct legal research regarding rule 59 deadline in conjunction with review and revision of opposition to finalize same for Mr. Clement's review.	0.50	137.50
07/13/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review plaintiffs' corresponding objection to bill of costs; legal research of authority cited in same to strategize regarding response, if any, to same.	0.40	110.00
07/13/20	JMM	Outline and begin drafting reply in support of motion for attorney fees; conduct legal research regarding evidentiary burden to prove harassment and bad faith to recover attorney fees.	3.20	880.00
07/13/20	CFC	Review and assess objection to bill of costs.	0.20	65.00
07/14/20	JMM	Continue legal research for and continue drafting reply in support of motion for attorney fees.	1.90	522.50

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Date	Atty	Description	Hours	Amount	
07/14/20	CFC	Review, assess, and evaluate issues relative to reply in support of motion to fees and opposition to motion for leave to amend complaint; coordinate with JMM on same.	0.40	130.00	
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
07/15/20	JMM	Continue and complete drafting of reply in support of motion for attorney fees.	2.60	715.00	
07/15/20	JMM	Review and revision of reply in support of motion for attorney fees and opposition to plaintiffs' motion for leave to amend to finalize both for filing; strategize regarding timing of filing both, and file same.	0.50	137.50	
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
07/15/20	CFC	Review, edit, and revise opposition to motion for leave to amend complaint; coordinate with JMM on issues relative to same.	0.30	97.50	
07/15/20	CFC	Review, edit, and revise reply in support of motion for attorney fees; coordinate with JMM on issues relative to same.	0.30	97.50	
07/17/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review plaintiffs' corresponding motion to reopen case.	0.20	55.00	
07/17/20	CFC	Review and assess motion to reopen case and set aside judgment.	0.30	97.50	
07/19/20	CFC	Review and assess reply in support of motion to amend complaint.	0.40	130.00	
07/20/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review plaintiffs' corresponding reply to response to motion to amend.	0.20	55.00	
07/20/20	JMM	Receipt and review notice of electronic filing and corresponding clerk's notice of plaintiffs' counsel's non-compliance with motion submission requirements.	0.10	27.50	
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
		[REDACTED]			
07/27/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review court's corresponding order on plaintiffs' motions to amend and for relief from judgment and client's motion for attorney fees.	0.20	55.00	
		[REDACTED]			
		[REDACTED]			

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[illegible]

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Date	Atty	Description	Hours	Amount
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
08/10/20	CFC	Review, assess, and evaluate issues, arguments, and positions relative to motion to dismiss first amended complaint; legal research regarding same; review and assess case law on same; coordinate with JMM on same.	1.30	422.50
08/11/20	JMM	Exchange emails with opposing counsel regarding extension of deadline to respond to amended complaint; prepare stipulation and order to accomplish same; email same to opposing counsel for review.	0.50	137.50
08/11/20	JMM	Receipt and review email from K. Gesund approving stipulation and authorizing electronic signature; review and revision of stipulation accordingly, finalize and file same.	0.20	55.00
08/11/20	CFC	Review and assess email exchanges with opposing counsel regarding issues relative to extension on response to first amended complaint and stipulation and order on same; coordinate with JMM on same; review and assess filed version of same.	0.40	130.00
08/13/20	CFC	Review and assess order granting stipulation and order to extend time to respond to first amended complaint.	0.10	32.50
08/14/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review clerk's corresponding bill of costs denying taxation of same; review order referenced by docket entry as basis for denial.	0.20	55.00
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
08/14/20	CFC	Review and assess order denying costs.	0.10	32.50
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
08/18/20	JMM	Assess, analyze, and review plaintiffs' first amended complaint and	0.70	192.50

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Date	Atty	Description	Hours	Amount
		further review of court's order dismissing original complaint; outline key points to be addressed in motion to dismiss first amended complaint.		
08/19/20	JMM	Strategy and analysis regarding impact of justice court proceedings and discovery in same on federal actions.	0.20	55.00
08/19/20	JMM	Begin legal research for and drafting of motion to dismiss.	2.60	715.00
08/19/20	CFC	Legal research regarding claim splitting doctrine; evaluate applicability of same to cases.	0.70	227.50
08/20/20	JMM	Continue legal research for and complete drafting of motion to dismiss.	2.20	605.00
08/20/20	CFC	Review, assess, and evaluate draft motion to dismiss; review and assess first amended complaint and prior briefing and orders on first motion to dismiss, in connection with same; legal research regarding same; coordinate with JMM regarding same.	3.40	1,105.00
08/21/20	CFC	Draft additions and revisions to motion to dismiss; legal research regarding case law in same; review, edit, and revise same; finalize same for filing.	3.30	1,072.50
09/02/20	CFC	Review and assess opposition to motion to dismiss.	0.60	195.00
09/03/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review plaintiffs' corresponding response to motion to dismiss and numerous exhibits thereto.	0.90	247.50
09/03/20	JMM	Assess, analyze, and review document governing opposing counsel's representation of consumers.	0.50	137.50
09/03/20	CFC	Email exchange with client regarding [REDACTED]; review and assess same.	0.30	97.50
09/06/20	JMM	Outline and conduct legal research for, and draft reply in support of motion to dismiss first amended complaint.	3.20	880.00
09/09/20	JMM	Review and revision of reply in support of motion to dismiss first amended complaint to finalize and file same.	0.30	82.50
09/09/20	CFC	Review, edit, and revise reply in support of motion to dismiss first amended complaint.	0.80	260.00
09/11/20	JMM	Receipt and review notice of electronic filing, and assess, analyze, and review plaintiffs' corresponding motion to file surreply and proposed surreply; strategize regarding need to or utility of filing opposition to	0.30	82.50

Date	Atty	Description	Hours	Amount
09/11/20	JMM	same.	1.70	467.50
09/11/20	JMM	Conduct legal research and draft opposition to plaintiffs' motion to file surreply.	0.30	82.50
09/11/20	CFC	Review and revision of opposition to motion for leave to file surreply to finalize, and subsequently file same.	0.40	130.00
09/11/20	CFC	Review and assess motion for leave to file surreply; review and assess proposed surreply; coordinate with JMM on response to same.	0.40	130.00
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
09/15/20	JMM	Assess, analyze, and review email from Ms. Armenta regarding [REDACTED]; follow-up telephone call with same regarding same.	0.30	82.50
09/15/20	JMM	Telephone conference with Ms. Armenta regarding [REDACTED]	0.60	165.00
09/15/20	JMM	Exchange multiple emails with K. Gesund about Munoz credit reporting.	0.20	55.00
09/15/20	CFC	Telephone call with client regarding [REDACTED].	1.10	357.50
[REDACTED]		[REDACTED]	[REDACTED]	[REDACTED]
09/15/20	CFC	Review and assess email exchanges with opposing counsel regarding issues relative to credit reporting; coordinate with JMM on same.	0.60	195.00
09/16/20	JMM	Receipt and review further email from K. Gesund regarding cost breakdown; subsequent telephone call with client [REDACTED].	0.30	82.50
09/17/20	JMM	Receipt and review telephone message from K. Gesund, and assess, analyze, and review subsequent email from same regarding reporting of court costs; [REDACTED]	0.20	55.00

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Date	Atty	Description	Hours	Amount
09/17/20	CFC	Review and assess email from opposing counsel regarding credit reporting issues.	0.10	32.50
09/18/20	JMM	Assess, analyze, and review email from K. Gesund regarding threat of new FDCA claim relating to credit reporting of court costs; legal research relating to same, and strategize [REDACTED]	0.40	110.00
09/18/20	JMM	Review file and conduct legal research in conjunction with drafting lengthy, formal email to K. Gesund regarding invalidity of any FDCA or FCRA claim relating to AcctCorp's credit reporting for Munoz's debt.	0.90	247.50
09/18/20	JMM	Follow-up telephone call with client regarding [REDACTED]	0.20	55.00
09/18/20	CFC	Review and assess email from opposing counsel regarding issues relative to credit reporting; coordinate with JMM on same and response to same.	0.30	97.50
09/20/20	CFC	Review and assess issues relative to response to opposing counsel regarding credit reporting issues and case law on same; coordinate with JMM on same; review and assess email from same to same regarding same.	0.20	65.00
09/21/20	JMM	Receipt and review email from K. Gesund regarding challenge to late fees; review prior pleadings to reconcile same with Ms. Gesund's position; respond to same regarding same.	0.20	55.00
09/21/20	CFC	Review and assess email exchanges with opposing counsel regarding issues relative to credit reporting.	0.30	97.50
09/22/20	JMM	Assess, analyze, and review multiple emails from clients regarding [REDACTED] evaluate and strategize regarding appropriate response to same; send follow email to K. Gesund regarding same.	0.40	110.00
09/22/20	CFC	Review and assess email exchanges with client regarding [REDACTED]; coordinate with JMM on same; review and assess email exchanges with opposing counsel regarding same.	0.60	195.00
09/24/20	JMM	Telephone call with client regarding [REDACTED].	0.50	137.50
09/24/20	JMM	Legal research regarding ability to credit report court costs allowed by contract before same are awarded by the court; email client regarding same.	0.70	192.50
09/24/20	JMM	Assess, analyze, and review email from K. Gesund regarding settlement proposal; respond to same; send follow-up email to clients [REDACTED]	0.30	82.50
09/24/20	CFC	Review and assess email exchanges with opposing counsel regarding settlement offer; email exchanges with client regarding [REDACTED]	0.50	162.50
09/25/20	CFC	Review and assess email from client regarding [REDACTED]	0.10	32.50
[REDACTED]			[REDACTED]	[REDACTED]

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Date	Atty	Description	Hours	Amount
[REDACTED]		[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
12/29/20	JMM	Review applicable rules regarding anticipated appeal of Ahmed justice court outcome to the district court; conduct legal research regarding timing of appeal on fee and costs award relative to entry of final judgment.	1.10	302.50
[REDACTED]		[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]		[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
01/06/21	JMM	Review Ahmed Justice Court docket to evaluate status of anticipated motion to retax costs and confirm department reassignment; strategize regarding submission of amended judgment to include fees and costs; email Ms. Armenta regarding same.	0.30	82.50
01/06/21	JMM	Review file and Ahmed/Munoz federal docket to assess status of motion to dismiss and related motion to file surreply, and review applicable discovery plan; strategize regarding action to be taken in case moving forward.	0.30	82.50
[REDACTED]		[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

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Date	Atty	Description	Hours	Amount
		and further strategize regarding same.		
01/19/21	JMM	Send email to K. Gesund regarding scheduling of telephone conference with same to discuss settlement; exchange subsequent follow-up emails with same regarding same.	0.20	55.00
01/19/21	CFC	Review and assess email exchange with client regarding fees and costs for evaluation of settlement; review and assess email to RCW's counsel regarding settlement; coordinate with JMM regarding global settlement issues and discussions.	0.60	195.00
01/20/21	JMM	Send follow-up email to K. Gesund confirming time for telephone conference with same to discuss global settlement.	0.10	27.50
01/21/21	JMM	Telephone conference with K. Gesund regarding global settlement; further evaluation of case posture, uncertainties in litigation, and ability to collect from consumer in order to determine reasonable compromise settlement number.	0.40	110.00
01/21/21	JMM	Receipt and review voice message from RC Willey attorney, Rick Hymas, regarding global settlement; return telephone call and leave message for same regarding same.	0.10	27.50
01/21/21	JMM	Telephone call with Ms. Armenta regarding global settlement and outcome of call with K. Gesund.	0.20	55.00
01/22/21	JMM	Lengthy telephone call with Rick Hymas, counsel for RC Willey, regarding global settlement of cases against K. Gesund.	0.40	110.00
01/25/21	JMM	Receipt and review voice message from RC Willey counsel, R. Hymas; return telephone call with same regarding global settlement; subsequent telephone call with client regarding same.	0.20	55.00
01/25/21	JMM	Review notes and prior emails from client and RC Willey's counsel in conjunction with drafting detailed settlement proposal email to K. Gesund.	0.30	82.50
01/25/21	CFC	Review, assess, and evaluate issues relative to proposed terms and conditions of settlement; coordinate with JMM on same; review and assess email to opposing counsel regarding same.	0.30	97.50
01/26/21	JMM	Assess, analyze, and review email from K. Gesund in response to settlement proposal; strategize regarding appropriate response to same, and send follow-up email to same regarding same.	0.20	55.00
01/26/21	CFC	Review, assess, and evaluate issues relative to settlement discussions, global settlement, and upcoming hearing; coordinate with JMM on same; review and assess email exchanges with opposing counsel regarding same.	0.70	227.50
01/27/21	JMM	Assess, analyze, and review order awarding reduced fee amount and costs in Ahmed justice court action and corresponding judgment; exchange emails with Ms. Armenta regarding same; review and revision of case value memorandum to update accordingly.	0.30	82.50
01/27/21	CFC	Review and assess order granting fees and costs and judgment; email exchanges with Donna Armenta regarding same; coordinate with JMM on same.	0.50	162.50

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Date	Atty	Description	Hours	Amount
		[REDACTED]		
		[REDACTED]		
01/28/21	JMM	Exchange emails with K. Gesund regarding latest settlement offer.	0.20	55.00
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
02/17/21	CFC	Review, assess, and evaluate issues relative to status of settlement discussions and individualized versus global settlement; coordinate with JMM on same.	0.30	97.50
02/22/21	CFC	Review and assess email exchanges with opposing counsel regarding global settlement offer; coordinate with JMM on same.	0.30	97.50
02/26/21	JMM	Receipt and review notices of filing, and assess, analyze, and review corresponding order granting motion to dismiss and related judgment; email client regarding same.	0.40	110.00
02/27/21	JMM	Exchange emails with client regarding [REDACTED]	0.10	27.50
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		
03/01/21	JMM	Receipt, review, and respond to email from K. Gesund regarding effect of Judge Mahan's dismissal decision on global settlement.	0.10	27.50
03/01/21	JMM	Assess, analyze, and review email from opposing counsel regarding counteroffer for global settlement; strategize regarding action to be taken and response, if any, to be provided to same; send follow-up email to clients regarding same.	0.20	55.00
03/01/21	CFC	Review, assess, and evaluate issues relative to global settlement, in light of counter offers and recent decision; coordinate with JMM on issues relative to same; email exchanges with client and co-defense counsel regarding same.	0.70	227.50
		[REDACTED]		
		[REDACTED]		
		[REDACTED]		

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